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April 29, 2025

VIA ECF

Hon. Lee G. Dunst
United States District Judge
United States District Court
Eastern District of New York
100 Federal Plaza, Courtroom 830
Central Islip, New York 11722

Re: Canon U.S.A., Inc. v. Sysorex, Inc. et al., No. 2:24-cv-08042-RER-LGD

Dear Judge Dunst:

This firm represents defendants Sysorex, Inc., Asaduz Zaman Khan and Wayne Wasserberg in the above-referenced action (the “**2024 Action**”), and file this letter in response to Canon U.S.A., Inc. plaintiff (“Plaintiff”) letter motion dated April 22, 2025 (Dkt. No. 27). Defendants respectfully request an extension of time to April 30, 2025 file the response to the letter motion to compel (“Motion to Compel”) made by Plaintiff April 23, 2025. Defendants noted the court’s April 23, 2025 Order directing Defendants to reply to the Motion to Compel by April 28, 2025, but the subject opposition has not been finalized or filed. Defendants are preparing the requisite reply, including clarifying the results of the parties’ meeting to confer and the substantive objections to Plaintiff’s document demands, but require more time to respond due scheduling and calendaring issues.

For the foregoing reasons, Defendants respectfully request a 48-hour extension of the Court Ordered deadline to respond to Plaintiff’s Motion to Compel.

Respectfully,

s/Ralph E. Preite
Ralph E. Preite

cc: Anthony P. Badaracco, Esq.
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